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13 *Attorneys for the Debtors and Reorganized
Debtors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION.

- and -

PACIFIC GAS AND ELECTRIC COMPANY.

Debtors.

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Case Nos. 19-30088 (DM)

(Lead Case) (Jointly Administered)

**DECLARATION OF MICHAEL J. REISS IN
SUPPORT OF REORGANIZED DEBTORS'
EX PARTE APPLICATION FOR ORDER
PURSUANT TO L.B.R. 9006-1 EXTENDING
TIME FOR REORGANIZED DEBTORS'
REPLY IN SUPPORT OF OBJECTIONS TO
CERTAIN SECURITIES CLAIMS**

[Related to Docket Nos. 14200, 14203, 14206]

[No hearing requested]

1 I, Michael J. Reiss, hereby declare that the following is true and correct to the best of my
2 knowledge, information, and belief:

3 1. I am a member of Latham & Watkins LLP, special counsel for Pacific Gas and
4 Electric Company and PG&E Corporation (collectively, the “**Debtors**” or “**Reorganized
5 Debtors**”). I respectfully submit this declaration in support of the *Ex Parte Application for Order
6 Pursuant to L.B.R. 9006-1 Extending Time for Reorganized Debtors’ Reply in Support of
7 Objections to Certain Securities Claims* (the “**Application**”).¹ Except as otherwise indicated, all
8 statements in this Declaration are based on my personal knowledge, and, if called upon to do so, I
9 could and would testify competently thereto.

10 2. The Application requests a two-week extension of time for the Reorganized
11 Debtors to file one or more reply briefs in support of the Objections.

12 3. On March 20 and 21, 2024, I spoke and/or corresponded with Michael Cantly and
13 Thomas Hoffman, counsel to PERA regarding the relief requested in the Application.
14 Mr. Hoffman confirmed via email on March 21, 2024 that PERA does not oppose PG&E’s
15 requested two-week extension.

16 4. On March 19 and 20, 2024, I spoke and corresponded with Richard Bodnar, counsel
17 to the RKS Claimants, regarding the relief requested in the Application. Mr. Bodnar confirmed
18 via email on March 20, 2024 that the RKS Claimants consent to PG&E’s requested two-week
19 extension.

20 5. On March 20, 2024, I spoke and corresponded with Michael Palmieri, counsel to
21 Baupost regarding the relief requested in the Application. Mr. Palmieri confirmed via email on
22 March 20, 2024 that Baupost consents to PG&E’s requested two-week extension.

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28 ¹ Capitalized terms used but not otherwise defined herein shall have the meanings given to
them in the Application.

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
2 and correct to the best of my knowledge, information, and belief.
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4 Executed March 29, 2024 in Los Angeles, California.
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6 */s/ Michael J. Reiss*
7 Michael J. Reiss
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